

1 PHILLIP A. TALBERT
United States Attorney
2 JUSTIN L. LEE
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for Plaintiff
United States of America
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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MYRA BOLECHE MINKS,
15 Defendant.
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CASE NO. 2:22-cr-00137-JAM-2

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
SPEEDY TRIAL ACT; ORDER**

DATE: November 5, 2024

TIME: 9:00 a.m.

COURT: Hon. John A. Mendez

17 **STIPULATION**

18 1. By previous order, this matter was set for status on November 5, 2024. On
19 the Court's own motion this date was moved to November 12, 2024.

20 2. By this stipulation, the defendant now moves to continue the **further status**
21 **conference** until **November 19, 2024, at 09:00 a.m.**, and to exclude time between
22 October 17, 2024, and November 19, 2024, under Local Codes T2 and T4.

23 3. The parties agree and stipulate, and request that the Court find the
24 following:

25 a) The government has represented that the discovery associated with
26 this case includes approximately 3,800 pages of reports, video and audio recordings,
27 and photographs. In addition, digital device extractions have been produced in
28 discovery and amount to approximately 10 TB of data. All of this discovery has

1 been produced directly to counsel.

2 b) Counsel for the defendant desires additional time to review the
3 discovery, discuss the case with the defendant, conduct investigation and research
4 related to the criminal charges, and otherwise prepare for trial.

5 c) Counsel for the defendant believes that failure to grant the above-
6 requested continuance would deny him the reasonable time necessary for effective
7 preparation, taking into account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by
10 continuing the case as requested outweigh the interest of the public and the
11 defendant in a trial within the original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18
13 U.S.C. § 3161, et seq., within which trial must commence, the time period of
14 October 17, 2024, to November 19, 2024, inclusive, is deemed excludable pursuant
15 to 18 U.S.C. § 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4] because this is a
16 complex case and it results from a continuance granted by the Court at defendant's
17 request on the basis of the Court's finding that the ends of justice served by taking
18 such action outweigh the best interest of the public and the defendant in a speedy
19 trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: October 21, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ JUSTIN L. LEE
JUSTIN L. LEE
Assistant United States Attorney

Dated: October 21, 2024

/s/ TODD LERAS
TODD LERAS
Counsel for Defendant
Myra Minks

ORDER

IT IS SO ORDERED.

Dated: October 23, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE